

**EXHIBIT D**

**Toth, Ashley L.**

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**From:** Toth, Ashley L.  
**Sent:** Tuesday, October 29, 2024 4:43 PM  
**To:** Yatvin, Alan  
**Cc:** Santarone, Joseph J.; Cohen, Noah S; Andrew Shubin; Marmer, Erin  
**Subject:** RE: Calderaio v. CBSD

Alan-

Let's schedule a meet and confer regarding the discovery issues. Please let me know your availability for this week or next. In the interim, however, please let me know whether you will be producing the witnesses we requested or whether we need to subpoena those witnesses. I currently have the following dates available for depositions in November:

November: 6, 7, 8, 11, 12, 15, 18, 19, 20, 21, 25, 26



**Ashley L. Toth**

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**From:** Yatvin, Alan <ayatvin@wgpllp.com>  
**Sent:** Wednesday, October 23, 2024 5:38 PM  
**To:** Toth, Ashley L. <ALToth@MDWCG.com>  
**Cc:** Santarone, Joseph J. <JJSantarone@MDWCG.com>; Cohen, Noah S <ncohen@wgpllp.com>; Andrew Shubin <shubin@shubinlaw.com>; Marmer, Erin <emarmer@wgpllp.com>  
**Subject:** RE: Calderaio v. CBSD

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Hey, Ashley, any update on the below?

Alan

**Alan L. Yatvin**  
Attorney at law

[PLEASE NOTE NEW FIRM NAME AND EMAIL ADDRESS](#)

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